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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

IN RE HANKINS PLASTIC SURGERY
ASSOCIATES, P.C. dba HANKINS & SOHN
PLASTIC SURGERY ASSOCIATES

This Document Relates to: All Actions

Case No.: 2:23-cv-00824-RFB-DJA

**JOINT STATUS REPORT
REGARDING STAY OF
DISCOVERY**

**Complaint Filed: March 30, 2023
Action Removed: May 25, 2023**

Plaintiffs Jennifer Tausinga, Alysia Wrenn, Sarah Jefferson, and Caroline Aurora (collectively “Plaintiffs”) on behalf of themselves and all other similarly situated, by and through co-interim counsel of record, Jennifer A. Fornetti of The Bourassa Law Group and Nicholas A. Colella of Lynch Carpenter LLP and Plaintiffs’ steering committee, Raina Borrelli of Strauss Borrelli PLLC, Ramzy Ladah of Ladah Law Firm, and additional Plaintiffs’ counsel Clark Seegmiller and Jonathan B. Lee of Richard Harris Law Firm, and Defendant Hankins & Sohn Plastic Surgery Associates, P.C. dba Hankins & Sohn Plastic Surgery Associates (“Defendant”) (Plaintiffs and Defendants collectively, “Parties”) by and through its counsel of record, Schnitzer Johnson & Watson, CHTD., and co-counsel McBride Hall, hereby submit the foregoing Joint Status Report regarding the parties’ efforts to resolve the action:

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1. On April 22, 2025, the Court granted the Parties' Stipulation and Order to Stay Discovery, staying all upcoming hearings and deadlines for sixty (60) days.

2. The Parties sought the stay to allow them time to explore the resolution of the action.

3. The Parties have been working diligently to plan and coordinate an agreed-upon mediation.

4. On April 17, 2025, counsel for the Parties first engaged in substantive discussions about the resolution of the case on a class-wide basis, including discussing in detail available mediators, and their background and availability during the months of May and June 2025.

5. During the following month, the Parties continued to confer regarding the availability of the Parties, their respective counsel, insurance carriers' representatives and counsel, and potential mediators.

6. Due to the difficulty in obtaining mutually available dates in the short term, the Parties continued to confer regarding dates in July, August, and September.

7. The Parties also invited the plaintiffs from the related State-Court cases, through their respective counsel, to join the mediation. Currently, there are seven (7) cases in State-Court, which are as follows:

Case Name	Case No.
<i>Savyna Roufeh v. Hankins Plastic Surgery Associates, et al.</i>	A-23-876800-C
<i>Farah Abraham v. Hankins Plastic Surgery Associates, et al.</i>	A-23-878755-C
<i>Jane Doe v. Hankins Plastic Surgery Associates, et al.</i>	A-24-887806-C
<i>Hallie Nolan v. Hankins Plastic Surgery Associates, et al.</i>	A-24-891982-C
<i>Alexas Cota v. Hankins Plastic Surgery Associates, et al.</i>	A-24-891387-C
<i>Elizabeth Carmona v. Hankins Plastic Surgery Associates, et al.</i>	A-25-909452-C

Case Name	Case No.
<i>Elisa Davidson v. Hankins Plastic Surgery Associates, et al.</i>	A-25-909454-C

8. Currently, the Parties have agreed to mediate the matter before the Honorable Gene T. Porter (Ret.). The mediation is tentatively scheduled for September 24-25, 2025.

9. While the Parties have been diligent in coordinating and scheduling the mediation, the delay has been caused by the difficulty of finding a mutually agreeable and available mediator, together with given the schedules of all persons and entities who must attend the mediation.

10. In addition to exploring mediators and coordinating with all counsel, the insurer's availability during this mediation also had to be determined. This process involved the coordination and participation of the parties, which required an evaluation and receiving the requisite authority to proceed.

11. This process, given the multiple parties, added another layer of complexity and considerable time, which delayed efforts to move this matter efficiently towards a prompt mediation date.

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12. Due to the first mutually agreeable dates for mediation being in September and considering the possibility that some or all of the State-Court Plaintiffs may join the mediation, the Parties intend to file a motion requesting that the stay continue to allow the mediation to proceed.

Dated: June 23, 2025

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